

# **EXHIBIT C**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SHAWN DRUMGOLD,  
Plaintiff

C.A. NO. 04-11193NG

v

TIMOTHY CALLAHAN, ET AL.  
Defendant(s)

**PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS TO  
THE DEFENDANT, THE CITY OF BOSTON**

The Plaintiff, Shawn Drumgold (hereinafter "Plaintiff"), pursuant to Fed. R. Civ. P. 34, requests that Defendant, the City of Boston (hereinafter "Defendant"), serve a written response to this Request For Production of Documents within thirty days of service hereof, answering or objecting to each category of documents herein requested to be produced and identify each document as to which Defendant claims a privilege. The Plaintiff further requests that the Defendant produce the documents described herein for inspection and copying at the office of Michael W. Reilly, Esq., Tommasino & Tommasino, Two Center Plaza, Boston, MA 02108.

**DEFINITION**

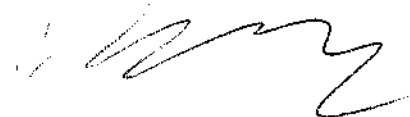
"Report" refers to Exhibit 187 of the Deposition of Francis M. Roache, bates stamps cob1601 through cob1796.

**REQUEST**

1. All documents which record, reflect or refer to the authorization or order to produce the report including but not limited to any correspondence between the Mayor of the City of Boston or the Police Commissioner of the City of Boston and any members of the Committee who prepared the report.
2. All documents which record, reflect or refer to the scope, nature or purpose of the report including but not limited to any such documents authored by the Mayor of the City of the Boston and any other employee of the City of Boston to any members of the Committee or by any of the persons who prepared the report.

3. All documents authored by Ann Marie Doherty or authored under her supervision or at her order which record, reflect or refer to the report.
4. All documents authored by any employees of the City of Boston including any employees of the Boston Police Department which respond, comment on, criticize or critique the report.
5. All documents authored by any employee of the City of Boston including the Boston Police Department which comment on or suggest the lack of trustworthiness in the sources or circumstances of the report.
6. All documents which set out the legal authorization or power to order preparation of the report including but not limited to any statute, city ordinance or regulation which provided the authority for the authorization or order to prepare the report.
7. All documents which record, reflect or refer to payment by the City of Boston directly or indirectly of the legal fees or costs of any Defendant, witness or potential witness in this case including but not limited to John Daley, Willis Saunders, Edward McNecly, Timothy Callahan, Richard Walsh or Paul McDonough.

Respectfully submitted,  
Plaintiff, By His Attorney,



Michael W. Reilly, Esq.  
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